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Counsel for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHAEL RODRIGUEZ,

Plaintiff,

vs.

WELLPATH, *et al.*,

Defendants.

CASE NO.: 2:19-cv-02074-ART-MDC

**STIPULATION TO EXTEND TIME TO
SUBMIT DISCOVERY PLAN AND
SCHEDULING ORDER [ECF NO. 142]**

Plaintiff, MICHAEL RUDOLPH RODRIGUEZ, by and through his attorney of record, JAMES D. URRUTIA, ESQ. of LJU LAW FIRM, and Defendants, NaphCare, Inc.; Estate of Harry Duran, M.D., Kendra Meyer, Lee Meisner, Earl Salviejo, and Larry Williamson, D.O., by and through their attorney of record, MELANIE L. THOMAS ESQ., and Defendant Las Vegas Metropolitan Police Department, Richard Forbus, and Fred Meyer, by and through their attorney of record, KRISTOPHER J. KALKOWSKI, ESQ., hereby submit their stipulation and agreement to extend the deadline to submit a discovery plan and scheduling order [ECF 142] and respectfully request that the Court extend the submittal deadline for an additional period of one week (7) days, making the Discovery Plan and Scheduling Order due on May 15, 2024. This request is supported in good cause and excusable neglect.

...

On April 29, 2024, a meet and confer session took place. However, parties are of the opinion that a second meet and confer is warranted to effectively resolve the specifics of the discovery to be conducted.

Dated this 6th day of May, 2024.

LJU LAW FIRM

/s/ James D. Urrutia

JAMES D. URRUTIA, ESQ.

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Counsel for Plaintiff, MICHAEL RODRIGUEZ

Dated this 6th day of May, 2024.

**LEWIS BRISBOIS BISGAARD & SMITH,
LLP**

/s/ Melanie L. Thomas

MELANIE L. THOMAS, ESQ.

(Bar No. 12576)

6385 S. Rainbow Blvd., Ste 600

Las Vegas, NV 89118

Counsel for Defendants

Dated this 6th day of May, 2024.

KAEMPFER CROWELL

/s/ Lyssa Anderson

LYSSA ANDERSON, ESQ.

Nevada Bar No. 5781

KRISTOPHER J. KALKOWSKI, ESQ.

Nevada Bar No. 14892

1980 Festival Plaza Drive, Suite 650

Las Vegas, NV 89135

Counsel for Defendants

IT IS SO ORDERED.

DATED: 5/6/24


UNITED STATES MAGISTRATE JUDGE

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